



235038

002 - Willow
"evaluating Sheet
piling alternative
in FS"

From: THOMAS SHORT on 02/21/2002 07:52 AM
To: "J. Brian von Gunten" cc: Shari Kolak, Eileen Furey, Jennifer Ostermeier, Stuart Hill, krawczyk, bucholtz
Subject: Re: EPA's Comments on Willow FS

Brian,

My apologies for not being clear. I am talking about developing an alternative that removes the sheet piling at A-site and re-engineers the bank in addition to leaving the current sheetpiling in place. Using sheet piling cost estimates to represent a worst-case cost circumstance for Willow is fine. We should, however, make it clear (if it isn't already) in the cost tables that other types of bank slope designs may cost less and that sheetpiling is representative of the higher end with respect to costs. Did that make sense?

Your other points are very good and we should talk through them when we discuss all of the comments. In any cases where we agree we should make sure the document reflects those sentiments.

Your thoughts on developing sub-alternatives representing different bank options is interesting. If we leave the bank type decision until design stage I suspect that some in the community will argue that the Proposed Plan and ROD didn't properly, or fully, allow them to weigh in on what was going to happen. Since the sheetpiling is such an explosive issue we should try to propose the basic type of bank control, be it sheetpiling, armoring, etc., in the FS and Proposed Plan. Developing sub-alternative based on different bank designs will allow the public to fully weigh in during public comment and will allow us to demonstrate that we're open to a variety of control measures, be they at Willow or A-Site.

Having said all of this, Georgia Pacific's heads are going to be spinning when they see the revised document. Any consideration to remove the sheetpiling at A-Site opens to the door to its selection which probably hasn't even entered their minds.

The other value to this approach (evaluating different bank designs at Willow and A-Site) will allow the trustees to calculate different restoration claim costs. Obviously the more natural the bank, the less the restoration claim and allows the us and Georgia Pacific to think globally as we move forward to remediation and restore this OU.

My apologies for sending all these thoughts via email, but I think it's important that all the players (technical, legal, and public affairs) understand where we may be going on this OU. Plus it helps ease the transition between Shari and I so that she knows what you and I are saying. Over the next month, most if not all of the communications should start going through Shari. My priorities are to get letters out on the 2 revised risk assessments, get the geomorphology IAG and MDEQ CA in place, get CH2M Hill on board for us and somehow work the Plainwell bankruptcy into the mix.

With respect to the bankruptcy, I need to start pulling Keith into the picture.

Tom.

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